

LEAD RENOVATION, REPAIR, AND PAINTING RULE INSPECTION REPORT

I. FACILITY: Roof Right, Inc.
1621 Hanover Pike
Hampstead, MD 21074
410-374-5923

II. DATE OF INSPECTION: July 14, 2015

III. EPA INSPECTOR: Paul J. Ruge Jr. SEE SSA-I

Paul J. Ruge Jr.
9/10/2015

IV. EPA REGION III, LAND AND CHEMICALS DIVISION (LCD)/TOXICS PROGRAMS BRANCH (TPB)

- John Armstead, LCD Director
- Harry Daw, LCD Associate Director for Office of Toxics and Pesticides
- Aquanetta L. Dickens, Chief, Toxics Programs Branch

V. PURPOSE OF INSPECTION:

The EPA conducted an inspection on July 14, 2015 of Roof Right, Inc., in response to a tip/complaint received from Jessica Skillman alleging Roof Right, Inc.'s failure to provide pre job notification via "Renovate Right" and contain paint chips that were disturbed on the exterior of the house while performing a renovation at 905 Adana Road, Pikesville, MD 21208. The tip/complaint was received on August 15, 2014 via phone from Jessica Skillman who was referred to the EPA by the State of Maryland Department of the Environment. On August 22, 2014 the complaint was received on the EPA RAV hotline. The inspection was performed in order to determine Roof Right, Inc.'s level of compliance with the Renovation, Repair, and Painting Rule.

VI. BACKGROUND INFORMATION:

On July 6, 2015, EPA sent an inspection notice via UPS to Roof Right, Inc. to establish an inspection on July 14, 2015 at 10:00 AM to determine Roof Right, Inc.'s level of compliance with the Renovation, Repair, and Painting Rule. Roof Right, Inc. was contacted on July 7, 2015 via phone and the date, time, and location was confirmed with Linda Standiford. During the call, EPA requested that Roof Right, Inc. make available for the inspectors a list of contracts for renovations they performed in pre-1978 properties or child-occupied facilities in the past year as was requested in the notice.

Background About the Company (Alleged Violator)

According to Dun & Bradstreet, Roof Right, Inc. employs seventeen individuals, has an undisclosed annual revenue, and has been in business and incorporated since January 12, 2001. No other names or DBA's were associated with the business.

On July 6, 2015, Inspector Ruge checked the FLPP database to determine if Roof Right, Inc. is a certified RRP firm. Records show that Roof Right, Inc. is a certified firm and became certified on December 2, 2010. The certification number is NAT-93803-1.

According to the company's website, their services include roofing and insulation, installation of doors and windows, roof repairs and inspections, and installation of siding and gutters.

Background About the Complainant

The tip/complaint was received from Jessica Skillman on August 15, 2014 alleging Roof Right, Inc.'s noncompliance with the Renovation, Repair, and Painting Rule. Jessica Skillman is a homeowner who entered into a contract with Roof Right, Inc. on June 6, 2014 to perform renovation work at 905 Adana Road, Pikesville, MD 21208 and observed alleged unsafe work practices while work was being performed. On August 18, 2014, EPA sent out a declaration form to Jessica Skillman requesting Jessica Skillman to provide written testimony regarding the alleged violations observed and to submit pictures, copies of executed contracts, and other information to support her allegations. In response to EPA's written request, on September 10, 2014, Jessica Skillman, submitted a completed declaration form and copies of a contract and inspection report. Pictures taken by Jessica Skillman were also received via email.

Information about the Property Where Alleged Violation Occurred

The violation is alleged to have occurred at 905 Adana Road, Pikesville, MD 21208. The latitude/longitude coordinates for this property address are 39.365452/-76.734601 according to <http://itouchmap.com/latlong.html>. According to RealQuest Professional, this property was built in 1941. According to the Region III Office of Enforcement, Compliance, and Environmental Justice, USEPA, this property is not located in an environmental justice area. According to the State of Maryland Department of Health, there have been no known reports of elevated blood lead levels for this property address.

VII. OPENING CONFERENCE

On July 14, 2015 at approximately 10:00 AM, an EPA inspector arrived at the offices of Roof Right, Inc. to conduct an inspection to determine Roof Right, Inc.'s level of compliance with the Renovation, Repair, and Painting Rule. Upon arrival, the inspector introduced himself, presented his credentials to Linda Standiford, and explained the purpose of his visit. Inspector Ruge also introduced Shirley Fan, EPA, who was accompanying Inspector Ruge on this inspection. The inspector asked Linda Standiford, Manager, if she was the person authorized to give consent to the inspection. Linda Standiford stated that she was, in fact, the appropriate person to consent to the inspection and sign on behalf of the company. Once this was established, Inspector Ruge presented and explained the Notice of Inspection Form to Linda Standiford and both the inspector and Linda Standiford signed the form. Next, Inspector Ruge presented and explained the Confidential Business Information Form to Linda Standiford and Linda Standiford signed the form. There were no questions about these documents.

After these forms were presented and signed, Inspector Ruge proceeded to explain that the purpose of the inspection was to determine Roof Right, Inc.'s level of compliance with the Renovation, Repair, and Painting Rule. Inspector Ruge also indicated that, as part of the inspection, he would be requesting to see contracts and/or statements of work for renovations performed in the past year as requested in the inspection notification letter sent out on July 6, 2015. Inspector Ruge stated that he would be selecting and scanning a percentage of these contracts and would be looking to identify where Roof Right, Inc. documented compliance with the various provisions of the Renovation, Repair, and Painting Rule (e.g. work practice standards, pre-Renovation Education, renovator and firm certifications, etc.).

Linda Standiford stated that the company was started in 1994, had an annual revenue of \$3.5 million dollars, and presently employed thirteen people and did not have any dba's. Clarence "Nick" Mott was the president of the company but was not available due to an ongoing health problem. She stated she had the authority to sign contracts for the company. The service area for the company was generally Baltimore, Carrol, and Howard Counties.

Inspector Ruge asked Linda Standiford if she was familiar with the Renovate, Repair, and Paint Rule. She stated she was and that the firm was certified and that Clarence Mott was a certified renovator. He was the only certified renovator employed by the company.

Linda Standiford gave Inspector Ruge four sub-contractor names that were used by Roof Right, Inc. Each had a renovators certification. After checking FLPP, Perry J. Hairsine Jr., as Perry J. Hairsine Jr., Inc., and Robert K. Bowers, as Elite Custom Home Builders, LLC. were certified firms as well. She did not have any written contracts with these sub-contractors.

Linda Standiford provided a list of owners and contracts that were worked on during the time period requested in the notification letter (July 1, 2014 to present) by email after the inspection occurred. The list identified some jobs where children were present but no ages were listed.

Linda Standiford stated Roof Right, Inc. did primarily new roof and replacement roof work. Very rarely did they disturb exterior painted surfaces; only if a soffit or fascia needed repair or if the drip edge disturbed an old painted fascia. In the case of the Skillman contract, they were asked to also repair the dormer that was damaged by a tree and replace the windows in both dormers. The carpentry work was done by Robert Bowers.

VIII. REVIEW OF FILES/AVAILABLE DOCUMENTS:

Based on the number of renovations performed in the past year, the EPA inspector(s) selected a total of seven contracts to be scanned for review. The list of property addresses along with the year built, and contract dates are listed below:

RENOVATION CONTRACTS:

	<u>ADDRESS</u>	<u>CONTRACT DATE</u>	<u>YR BLT</u>
1.	139 Dewey Drive, Annapolis, MD 21401	10/3/2014	1972
2.	411 Dyer Ave., Reistertown, MD 21136	11/19/2014	1954
3.	2502 Lewis Lane, Finksburg, MD 21048	8/7/2014	1976
4.	311 Waterview Ct., Hampstead, MD 21074	12/12/2014	1986
5.	303 Taplow Rd, Baltimore, MD 21212	2/17/2015	1929
6.	4200 S. Hunter Rd., Hampstead, MD 21074	6/30/2015	1959
7.	905 Adana Rd, Pikesville, MD 21208	5/16/2014	1941

LOCATION OF CONTRACTS

	<u>ADDRESS</u>	<u>GPS COORDINATES</u>
1.	139 Dewey Drive, Annapolis, MD 21401	38.985977/-76.513074
2.	411 Dyer Ave., Reistertown, MD 21136	39.473364/-76.820724
3.	2502 Lewis Lane, Finksburg, MD 21048	39.538938/-76.905268
4.	311 Waterview Ct., Hampstead, MD 21074	39.583812/-76.898829
5.	303 Taplow Rd, Baltimore, MD 21212	39.360620/-76.614923
6.	4200 S. Hunter Rd., Hampstead, MD 21074	39.619401/-76.846509
7.	905 Adana Rd., Pikesville, MD 21208	39.365452/-76.734601

According to the Region III Office of Enforcement, Compliance, and Environmental Justice, USEPA, none of the six properties listed above are located in an environmental justice area. According to the State of Maryland Department of Health, there have been no known reports of elevated blood lead levels for these property addresses.

IX. CLOSING CONFERENCE

After all transaction documents were copied and recorded on the Receipt for Documents Form, Inspector Ruge provided a copy of the Receipt for Documents Form to Linda Standiford which Linda Standiford signed. The inspector provided Linda Standiford with a compliance assistance package and briefly explained its contents. Inspector Ruge asked Linda Standiford if she had any additional questions. Linda Standiford asked when the company might hear something. Inspector Ruge stated that once he had written the report, it would be submitted to the EPA compliance officers. No time frame was given.

Inspector Ruge and Shirley Fan, EPA, thanked Linda Standiford for her time and left the premises of Roof Right, Inc. at approximately 1:00 PM.

